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23 UNITED STATES DISTRICT COURT
24 CENTRAL DISTRICT OF CALIFORNIA
25 WESTERN DIVISION

26 Consumer Financial Protection
27 Bureau,

28 Plaintiff,

v.

D and D Marketing, Inc., d/b/a
T3Leads, *et al.*,

Defendants.

Case No. 2:15-cv-9692-PSG(Ex)

Honorable Philip S. Gutierrez

PLAINTIFF'S RESPONSE TO GASPARYAN'S
MOTION FOR CONSOLIDATION

Hearing Date & Time: April 17, 2017; 1:30 p.m.

Courtroom 6A, 350 West 1st Street, 6th Floor,
Los Angeles, California 90012

1 The Consumer Financial Protection Bureau (Bureau) is plaintiff in three
 2 related cases,¹ which it believes should be consolidated for all purposes. Davit
 3 Gasparyan, a defendant in one of the related cases, filed identical motions in all three
 4 cases seeking consolidation for pretrial purposes only.² The Bureau responded to
 5 Gasparyan's motion in his case, No. CV 16-2725, on February 17, 2017 (ECF No.
 6 60), and asked the Court to consolidate the three related cases for all purposes.

7 For the Court's convenience, the Bureau files this response, incorporating by
 8 reference the response filed in the *Gasparyan* case, attached hereto as Exhibit 1.
 9 Consolidation for all purposes instead of only for pretrial purposes will promote
 10 efficiency and will avoid unnecessary duplication of effort and inconsistent results.
 11 A proposed order for consolidation is provided.

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 14 Dated: March 22, 2017

CONSUMER FINANCIAL PROTECTION BUREAU
 By /s/ Meghan Sherman Cater
 Meghan Sherman Cater
 Attorney for Plaintiff,
 Consumer Financial Protection Bureau

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 25 ¹ *CFPB v. Davit Gasparyan*, 2:16-cv-2725-PSG(Ex); *CFPB v. D and D Marketing,*
 26 *Inc., d/b/a T3Leads, et al.*, 2:15-cv-9692-PSG(Ex); and *CFPB v. Dmitry Fomichev*,
 2:16-cv-2724-PSG(Ex).

27 ² Gasparyan does not cite any authority that would allow him to file his motion in
 28 cases to which he is not a party.